

STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION DIVISION OF AIR QUALITY AIR PERMITS PROGRAM

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SENT VIA EMAIL

September 3, 2008

John Bunyak
Air Resources Division
National Park Service
P.O. Box 25287
Denver, CO 80225

Subject: Comments on Draft FLAG 2008 Report

Dear Mr. Bunyak:

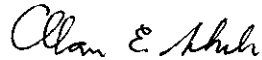
I'm providing the following comments for your consideration regarding the June 2008 draft revisions to the Phase I Report issued by the Federal Land Managers' Air Quality Related Values Workgroup (FLAG). As a general comment, the proposed revisions are warranted and helpful. My specific comments regard the Initial Screening Criteria in Section C.2 and are listed below.

1. Please clarify how the Q/D approach should be used when the project regards a modification of an existing source. I assume the *project* emissions, rather than the *total* emissions for the stationary source, would be used for "Q" since that is the typical approach used in PSD permitting. Either way, the desired approach should be clearly stated.
2. To further clarify that Q/D applies to modifications, the workgroup may wish to revise the last sentence on page 26 to read: "In addition... for sources locating/*located* greater than 50 km from a Class I area" (emphasis added).
3. The workgroup should likewise clarify whether the emissions from nonroad engines (as defined under 40 CFR 89) should be included in the Q/D calculation. These emissions do not count towards permit applicability, but they can be included in ambient assessments. I assume they would therefore be included in the Q/D calculation. However, the workgroup's intentions should be clearly stated to avoid potential confusion.
4. The use of a double-negative in the second sentence under "d. Summary (*Revised*)" of page 37 is initially confusing. The workgroup may want to restructure this sentence.
5. When using multi-page tables (e.g., Table V.1-1 and Table V.1-2), please include the Table number and an abbreviated title (e.g., "20% Best Natural Conditions – continued") on each

page. As currently presented, it's very easy to get Tables V.1-1 and V.1-2 confused due to the identical column labels.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan E. Schuler". The signature is fluid and cursive, with the first name "Alan" being the most prominent.

Alan E. Schuler, P.E.
Environmental Engineer

cc: John Kuterbach, ADEC/APP, Juneau
Sally Ryan, ADEC/APP, Anchorage
Rebecca Smith, ADEC/APP, Juneau